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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

AMA MULTIMEDIA, LLC, a Nevada limited
liability company,

Plaintiff,

v.

BORJAN SOLUTIONS, S.L. d/b/a
SERVIPORNO, a Spanish company; and
BORJAN MERA URRESTARAZU, an
individual,

Defendants.

Case No. 2:15-cv-01673-JCM-(GWF)

**DEFENDANTS' ERRATA TO MOTION
TO DISMISS AND FOR AN AWARD OF
CONTRACTUAL COSTS AND FEES**

1 Defendants Borjan Solutions, S.L. and Borjan Mera Urrestarazu (collectively, the
 2 “Defendants”), by and through their counsel of record, hereby submit this Errata to the filing of
 3 Defendants’ Motion to Dismiss and For An Award of Contractual Costs and Fees (Dkt. No. 7)
 4 made on December 24, 2015.

5 In the initial filing, Defendants inadvertently omitted an exhibit to the Affidavit of Borjan
 6 Mera Urrestarazu In Support of Defendants’ Motion to Dismiss (the “Urrestarazu Aff.”) (Dkt.
 7 No. 7-1). Defendants therefore attach a copy of the Urrestarazu Aff. to this Errata with the
 8 inadvertently omitted exhibit thereto (Ex. 1).

9 DATED this 28th of December, 2015.

10 **HOLLEY DRIGGS WALCH FINE WRAY
 PUZEY & THOMPSON**

11 /s/ James D. Boyle

JAMES D. BOYLE, ESQ.

12 Nevada Bar No. 08384

400 South Fourth Street, Third Floor

13 Las Vegas, Nevada 89101

14 **CIAMPA FRAY-WITZER, LLP**

15 Evan Fray-Witzer, Esq. (*pro hac vice forthcoming*)

20 Park Plaza, Suite 804

16 Boston, Massachusetts 02116

17 **BOSTON LAW GROUP, PC**

18 Valentin Gurvits, Esq. (*pro hac vice forthcoming*)

Matthew Shayefar, Esq. (*pro hac vice forthcoming*)

19 825 Beacon Street, Suite 20

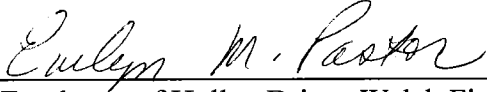
20 Newton, Massachusetts 02459

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I certify that I caused the document entitled **DEFENDANTS' ERRATA TO MOTION TO DISMISS AND FOR AN AWARD OF CONTRACTUAL COSTS AND FEES** to be electronically filed and served this 28th day of December, 2015 to the following:

Attorneys of Record	Parties Represented	Method of Service
Marc J. Randazza, Esq. Ronald D. Green, Esq. Randazza Legal Group 3625 South Town Center Drive Suite 150 Las Vegas, Nevada 89135 ecf@randazza.com	AMA Multimedia, LLC	<input type="checkbox"/> Personal Service <input checked="" type="checkbox"/> Email/E-File <input type="checkbox"/> Fax Service <input type="checkbox"/> Mail Service

DATED this 28th day of December, 2015.


 An Employee of Holley Driggs Walch Fine Wray
 Puzey & Thompson

1 **JAMES D. BOYLE** (Nevada Bar No. 08384)
2 **HOLLEY DRIGGS WALCH FINE WRAY PUZEY & THOMPSON**
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10 **BOSTON LAW GROUP, PC**
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14 Facsimile: 617-928-1802
15 vgvurits@bostonlawgroup.com
16 matt@bostonlawgroup.com

17 **EVAN FRAY-WITZER** (*pro hac vice* pending)
18 **CIAMPA FRAY-WITZER, LLP**
19 20 Park Plaza, Suite 505
20 Boston, Massachusetts 02116
21 Telephone: 617-426-0000
22 Facsimile: 617-507-8043
23 evan@CFWLegal.com

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

17 **AMA MULTIMEDIA, LLC**
18 a Nevada limited liability company,
19 Plaintiff,

v.

20 **BORJAN SOLUTIONS, S.L. d/b/a**
21 **SERVIPORNO**, a Spanish company; and
22 **BORJAN MERA URRESTARAZU**,
23 an individual,
Defendants.

Case No. 2:15-cv-01673-JCM-(GWF)

**AFFIDAVIT OF BORJAN MERA
URRESTARAZU IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS**

**URRESTARAZU AFFIDAVIT SUPPORTING DEFENDANTS' MOTION TO DISMISS
CASE NO. 2:15-cv-01673-JCM-(GWF)**

**AFFIDAVIT OF BORJAN MERA URRESTARAZU IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS**

I, Borjan Mera Urrestarazu, affirm and declare as follows:

1. My name is Borjan Mera Urrestarazu. I am over the age of 18. I am a resident of Spain. I have personal knowledge of the facts stated herein.

2. I am a manager for Borjan Solutions, S.L. which operates serviporno.com ("BSSL").

3. On or about August 19, 2013, I entered into that certain Settlement Agreement and Mutual Release (the "Settlement Agreement") with SSC Group, LLC d/b/a PornPros (which I understand now does business as AMA Multimedia, LLC, "AMA"), BSSL and Monetia S.L.

4. Pursuant to the terms of the Settlement Agreement, promptly after entering into the Settlement Agreement BSSL created the Porn Pros Removal Form that would allow AMA to automatically remove files from BSSL's websites.

5. In the over two years since BSSL created the Porn Pros Removal Form, AMA has never once submitted a single URL for removal with that specialized tool.

6. During that same time period, AMA or its agents have sent BSSL fewer than a dozen DMCA takedown notices. Copies of all those DMCA takedown notices received on behalf of AMA from the date of the Settlement Agreement to August 18, 2015 (after AMA attempted to file for arbitration) are attached hereto as Exhibit 1.

7. With respect to each of the URLs listed on the takedown notices, BSSL promptly took down the allegedly infringing files upon receipt of the DMCA takedown notice.

8. BSSL and its websites are managed entirely from Spain.

9. All of BSSL's employees are located in Spain.

1 10. BSSL does not engage, contract for or purchase any servers in the United States
2 to host its websites. BSSL uses LeaseWeb, a hosting company from the Netherlands, for its
3 hosting solutions. As part of these hosting solutions, LeaseWeb provides a Content Delivery
4 Network (CDN) for BSSL's websites. To my understanding, a CDN delivers content to a user
5 from the closest of many file storage locations around the world and LeaseWeb, like all other
6 useful CDNs, has file storage locations around the whole world. For example, if a user from
7 China accesses a file on one of BSSL's websites, LeaseWeb may serve that file from a file
8 storage location it has in China. Therefore, although it is possible that LeaseWeb (without our
9 specific request to do so) may replicate some of the files from BSSL's websites onto a server in
10 the United States so that it can then serve it to a user in the United States, BSSL does not itself
11 host any content in the United States and has not selected or requested that LeaseWeb host any
12 content in the United States.

13 11. In short, to the extent that any of BSSL's websites are served from within the
14 United States, it is not because BSSL chose to have it served from the United States. It is
15 because of the way a CDN works.

16 12. BSSL does not aim its websites at any particular country, but rather its websites
17 are aimed at the entire world of internet users who speak the language used on each particular
18 website.

19 13. Each of BSSL's websites have visitors from countries all around the world.

20 14. BSSL has never had a presence in or significant contacts with the United States.

21 15. BSSL does not have (and has never had) any employees in the United States.

22 16. BSSL does not have (and has never had) a bank account in the United States.
23

1 17. BSSL does not own or lease (and has never owned or leased) real estate in the
2 United States.

3 18. BSSL does not pay (and has never paid) taxes in the United States.

4 19. BSSL does not have (and has never had) an agent for the service of process in the
5 United States.

6 20. BSSL does not have (and has never had) a telephone number in the United States.

7 21. I have never had significant contacts with the United States.

8 22. I do not maintain (and have never maintained) a bank account in the United
9 States.

10 23. I do not pay (and have never paid) taxes in the United States.

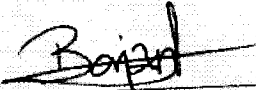
11 24. I do not have (and have never had) a telephone number in the United States.

12 25. My visits to the United States have been limited to short vacations and to attend
13 trade conventions.

14 26. I do not direct or control the content that appears on BSSL's websites.

1 I swear under the pains and penalties of perjury that the foregoing is true and correct.
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3 Dated: December 23, 2015
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Borjan Mera Urrestarazu

URRESTARAZU AFFIDAVIT SUPPORTING DEFENDANTS' MOTION TO DISMISS
CASE NO. 2:15-cv-01673-JCM-(GWF)

Exhibit 1

From: **dmca** <dmca@removeyourcontent.com>
Date: 2015-07-02 20:56 GMT+02:00
Subject: Infringement Notice JBGXQ-5725477-4
To: dmca@servitubes.com

Removeyourcontent , LLC
616 Corporate Way, Suite 2-5065
Valley Cottage, NY 10989
USA

Ph: [845-217-0833](tel:845-217-0833)

E-mail: dmca@removeyourcontent.com

7/2/2015 2:56:23 PM

Copyright Infringement Notice

re: <http://www.pornburst.xxx> (IP 104.28.12.104)

Gentlemen:

Please take appropriate action to disable access to the infringing materials described below, in accordance with the provisions of the Digital Millennium Copyright Act of 1998 and the Berne Convention. Should you require further information regarding this matter, please feel free to contact me.

Regards,

Tony Shultzmman - Operations Manager

<http://www.removeyourcontent.com>

ELECTRONIC NOTICE OF COPYRIGHT INFRINGEMENT

I, the undersigned, CERTIFY UNDER PENALTY OF PERJURY that I am an agent authorized to act on behalf of the owner of certain intellectual property rights, said owner being named:

<http://www.pornpros.com>

©Copyright Copyrighted adult pictures or videos

I have a good faith belief that the items or materials listed below are not authorized by the above IP Owners, their agents, or the law and therefore infringe the IP Owner's rights. Please act expeditiously to remove or disable access to the material or items claimed to be infringing.

I may be contacted at:

Alleged infringing work or right meets one of the following conditions:

- 1) Illegally hosted copyrighted dvd cover art or broadcast marketing collateral.
- 2) Illegal peer to peer resources such as torrent hash tracking sites or complicit activity for file sharing.
- 3) Illegal file-sharing services such as cyberlockers.
- 4) Illegal or unauthorized streaming services of copyrighted dvd or broadcast media.
- 5) Illegal use of member protected online videos or pictures.

- This notice may also serve as notification for the unauthorized use of IP Owner's trademark in commerce.

Original Materials & Copyright Holder(s):

AMA / SSCGroup, LLC

M. Sullivan

Custodian of Records

16673 Roscoe Blvd

North Hills, CA 91343

Location of Original Works:

<http://www.pornpros.com>

URL(s) of Infringed Works or Right:

<http://www.pornburst.xxx/videos/watching-porn-with-her-boy/>

Hosting providers and websites residing outside the United States may refer to wipo.int for international copyright information,

The information transmitted by the preceding e-mail is intended only for the addressee and may contain confidential and/or privileged material. Any interception, review, retransmission, dissemination, or other use of, or taking of any action upon this information by persons or entities other than the intended recipient is prohibited by law and may subject them to criminal or civil liability. If you received this communication in error, please contact us immediately by email to info@removeyourcontent.com or at 845-217-0833 , and delete the communication from any computer or network system.

From: **dmca** <dmca@removeyourcontent.com>
Date: 2015-05-01 23:30 GMT+02:00
Subject: Infringement Notice KDZKG-0869318-9
To: dmca@servitubes.com

Removeyourcontent , LLC
616 Corporate Way, Suite 2-5065
Valley Cottage, NY 10989
USA

Ph: [845-217-0833](tel:845-217-0833)

E-mail: dmca@removeyourcontent.com

5/1/2015 5:30:26 PM

Copyright Infringement Notice

re: <http://www.pornburst.xxx> (IP 104.28.12.104)

Gentlemen:

Please take appropriate action to disable access to the infringing materials described below, in accordance with the provisions of the Digital Millennium Copyright Act of 1998 and the Berne Convention.

Should you require further information regarding this matter, please feel free to contact me.

Regards,

Tony Shultzmnn - Operations Manager

<http://www.removeyourcontent.com>

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Original Materials & Copyright Holder(s):

AMA / SSCGroup, LLC

M. Sullivan

Custodian of Records

16673 Roscoe Blvd

North Hills, CA 91343

Location of Original Works:

<http://www.pornpros.com>

URL(s) of Infringed Works or Right:

<http://www.pornburst.xxx/videos/the-woman-of-my-dreams/>

Hosting providers and websites residing outside the United States may refer to wipo.int for international copyright information,

The information transmitted by the preceding e-mail is intended only for the addressee and may contain confidential and/or privileged material. Any interception, review, retransmission, dissemination, or other use of, or taking of any action upon this information by persons or entities other than the intended recipient is prohibited by law and may subject them to criminal or civil liability. If you received this communication in error, please contact us immediately by email to info@removeyourcontent.com or at 845-217-0833 , and delete the communication from any computer or network system.

From: **Anna FYC** <anna@fuckyoucash.com>
Date: 2014-03-17 21:41 GMT+01:00
Subject: Copyright Infringement
To: DMCA@servitubes.com

SSC Group , LLC
6345 Balboa Blvd, Ste 165
Encino, CA 91316
USA
E-mail: anna@fuckyoucash.com

Copyright Infringement Notice

re: <http://www.videogratis.tv>

Gentlemen:

Please take appropriate action to disable access to the infringing materials described below, in accordance with the provisions of the Digital Millennium Copyright Act of 1998 and the Berne Convention. Should you require further information regarding this matter, please feel free to contact me.

Regards,
Anna Gallant, DMCA Manager
<http://www.pornpros.com>

ELECTRONIC NOTICE OF COPYRIGHT INFRINGEMENT

I, the undersigned, CERTIFY UNDER PENALTY OF PERJURY that I am an agent authorized to act on behalf of the owner of certain intellectual property rights, said owner being named:

<http://www.pornpros.com>

©Copyright Pornpros.com

I have a good faith belief that the items or materials listed below are not authorized by the above IP Owners, their agents, or the law and therefore infringe the IP Owner's rights. Please act expeditiously to remove or disable access to the material or items claimed to be infringing.

I may be contacted at:

Printed Name: Anna Gallant
Title: DMCA Manager

Company: SSC Group, LLC
Street Address: 6345 Balboa Blvd, Ste 165
City and State: Encino, CA
Country: USA
Postal code: 91316
Email (correspondence): anna@fuckyoucash.com

Truthfully,
/S/: Anna Gallant

Alleged infringing work or right meets one of the following conditions:

- 1) Illegally hosted copyrighted dvd cover art or broadcast marketing collateral.
 - 2) Illegal peer to peer resources such as torrent hash tracking sites or complicit activity for file sharing.
 - 3) Illegal file-sharing services such as cyberlockers.
 - 4) Illegal or unauthorized streaming services of copyrighted dvd or broadcast media.
 - 5) Illegal use of member protected online videos or pictures.
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Original Materials & Copyright Holder(s):

SSC Group, LLC
M. Sullivan
Custodian of Records
16673 Roscoe Blvd
North Hills, CA 91343

Location of Original Works:

<http://www.pornpros.com>

URL(s) of Infringed Works or Right:

<http://www.videosgratis.tv/ver/la-deliciosa-august-ames/>
<http://www.videosgratis.tv/ver/madison-ivy-romantica-pero-ardiente/>
<http://www.videosgratis.tv/ver/sexo-romantico-con-alison-star/>
<http://www.videosgratis.tv/ver/casting-a-la-polaca-natalia-starr/>
<http://www.videosgratis.tv/ver/garganta-profunda-para-desayunar/>
<http://www.videosgratis.tv/ver/whitney-westgate-afortunada-y-follada/>
<http://www.videosgratis.tv/ver/sexo-sensual-con-dani-daniels/>
<http://www.videosgratis.tv/ver/fantasia-en-hd-con-lily-love/>
<http://www.videosgratis.tv/ver/erotica-follada-con-lily-love/>
<http://www.videosgratis.tv/ver/lily-carter-la-secretaria-cachonda/>
<http://www.videosgratis.tv/ver/el-fontanero-revisa-a-dillion-harper/>
<http://www.videosgratis.tv/ver/san-valentin-con-brooklyn-chase/>
<http://www.videosgratis.tv/ver/holly-michaels-distrae-a-su-novio/>
<http://www.videosgratis.tv/ver/contorsionismo-romantico-con-holly-michaels/>

<http://www.videosgratis.tv/ver/trio-con-las-peluqueras/>
<http://www.videosgratis.tv/ver/la-belleza-natural-de-keisha/>
<http://www.videosgratis.tv/ver/se-le-acumula-el-trabajo/>
<http://www.videosgratis.tv/ver/cinco-lujuriosas-escenas/>
<http://www.videosgratis.tv/ver/sexo-glamuroso-con-la-milf-julia-ann/>
<http://www.videosgratis.tv/ver/ava-addams-madura-pero-muy-caliente/>
<http://www.videosgratis.tv/ver/ava-addams-bronceada-y-follada/>
<http://www.videosgratis.tv/ver/sexo-elegante-con-dani-jensen/>
<http://www.videosgratis.tv/ver/dani-jensen-esclava-anal/>
<http://www.videosgratis.tv/ver/pelirrojas-jugando-al-twister/>
<http://www.videosgratis.tv/ver/kennedy-leigh-pone-el-postre/>
<http://www.videosgratis.tv/ver/rachel-starr-follada-en-el-billar/>
<http://www.videosgratis.tv/ver/paraiso-tropical-con-whitney-y-lily/>
<http://www.videosgratis.tv/ver/champagne-masaje-y-sexo/>
<http://www.videosgratis.tv/ver/caliente-anal-con-adriana-chechik/>

Thank you

Anna

From: **Nate Glass** <nate@takedownpiracy.com>
Date: 2015-02-19 2:43 GMT+01:00
Subject: DMCA Notice for Copyright Holder : Porn Pros
To: "Freemovies.tv" <DMCA@servitubes.com>

My name is Nate Glass, and I am a person authorized to act on behalf of the owner of an exclusive right that is being infringed.

Authorized DMCA Agent:
Nate Glass
8045 Retriever Ave.
Las Vegas, NV
89147
(818) 730-4666
nate@takedownpiracy.com

Copyright Holder:
Porn Pros
16673 Roscoe Blvd.
North Hills, CA
91343

The following works are the copyrighted property of Porn Pros:
<http://www.pornburst.xxx/videos/a-formal-threesome/>

A representative list of these works is available at <http://www.pornpros.com>

Under penalty of perjury:
I have a good-faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent or the law.

The information in the notification is accurate.

I am authorized to act
on behalf of the owner of an exclusive right that is allegedly infringed.

This notice is also to inform the allegedly infringing service provider that the copyright holder listed above has not licensed, to the allegedly infringing website, any works to be used in the manner depicted above. Furthermore, copyright holder strongly encourages the operators of the allegedly infringing site to not allow the continued use of copyright holders works without the expressed

written consent of the copyright holder. This includes, but is not limited to, filtering of content as well as prohibiting the use of copyright holders content in an infringing manner.

As per DMCA law section 512(i) to be eligible for Safe Harbor a service provider must meet certain requirements. One of these requirements is:

"(service provider)...has adopted and reasonably implemented, and informs subscribers of the service of, a policy for the termination of subscribers of the service who are repeat infringers"

For this reason, copyright holder strongly encourages the recipient of this notice to adopt and implement a repeat infringer policy.

In order to make the content removal process easier in the future, Takedown Piracy suggests that you add the copyright holder listed in this notice to a list of Prohibited or Banned Content on your site and filter and/or remove any content owned by this copyright owner.

Please note that all DMCA notices sent by Takedown Piracy are checked to ensure compliance by the allegedly infringing website. Notices that have not been satisfied will be escalated to, including but not limited to, webhost and upstream provider. In the event of non-compliance, Takedown Piracy can and will confer with the clients legal representatives and/or specialists in copyright infringement law.

All Rights Reserved.

--

Nate Glass
Authorized DMCA Agent
[Email:nate@takedownpiracy.com](mailto:nate@takedownpiracy.com)

From: **Nate Glass** <nate@takedownpiracy.com>
Date: 2015-01-18 18:31 GMT+01:00
Subject: DMCA Notice for Copyright Holder : Porn Pros
To: DMCA@servitubes.com

My name is Nate Glass, and I am a person authorized to act on behalf of the owner of an exclusive right that is being infringed.

Authorized DMCA Agent:
Nate Glass
8045 Retriever Ave.
Las Vegas, NV
89147
[\(818\) 730-4666](tel:(818)730-4666)
nate@takedownpiracy.com

Copyright Holder:
Porn Pros
16673 Roscoe Blvd.
North Hills, CA
91343

The following works are the copyrighted property of Porn Pros:
<http://www.freemovies.tv/video/alektra-blue-surprises-her-boyfriend/>

A representative list of these works is available at <http://www.pornpros.com>

Under penalty of perjury:
I have a good-faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent or the law.

The information in the notification is accurate.

I am authorized to act
on behalf of the owner of an exclusive right that is allegedly infringed.

This notice is also to inform the allegedly infringing service provider that the copyright holder listed above has not licensed, to the allegedly infringing website, any works to be used in the manner depicted above. Furthermore, copyright holder strongly encourages

the operators of the allegedly infringing site to not allow the continued use of copyright holders works without the expressed written consent of the copyright holder. This includes, but is not limited to, filtering of content as well as prohibiting the use of copyright holders content in an infringing manner.

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All Rights Reserved.

--

Nate Glass
Authorized DMCA Agent
[Email:nate@takedownpiracy.com](mailto:nate@takedownpiracy.com)

From: **Nate Glass** <nate@takedownpiracy.com>
Date: 2014-10-08 3:40 GMT+02:00
Subject: DMCA Notice for Copyright Holder : Porn Pros
To: DMCA@servitubes.com

My name is Nate Glass, and I am a person authorized to act on behalf of the owner of an exclusive right that is being infringed.

Authorized DMCA Agent:
Nate Glass
8045 Retriever Ave.
Las Vegas, NV
89147
[\(818\) 730-4666](tel:(818)730-4666)
nate@takedownpiracy.com

Copyright Holder:
Porn Pros
16673 Roscoe Blvd.
North Hills, CA
91343

The following works are the copyrighted property of Porn Pros:
<http://www.freemovies.tv/video/madison-ivy-doing-an-amateur-threesome/>

A representative list of these works is available at <http://www.pornpros.com>

Under penalty of perjury:
I have a good-faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent or the law.

The information in the notification is accurate.

I am authorized to act
on behalf of the owner of an exclusive right that is allegedly infringed.

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the operators of the allegedly infringing site to not allow the continued use of copyright holders works without the expressed written consent of the copyright holder. This includes, but is not limited to, filtering of content as well as prohibiting the use of copyright holders content in an infringing manner.

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"(service provider)...has adopted and reasonably implemented, and informs subscribers of the service of, a policy for the termination of subscribers of the service who are repeat infringers"

For this reason, copyright holder strongly encourages the recipient of this notice to adopt and implement a repeat infringer policy.

In order to make the content removal process easier in the future, Takedown Piracy suggests that you add the copyright holder listed in this notice to a list of Prohibited or Banned Content on your site and filter and/or remove any content owned by this copyright owner.

Please note that all DMCA notices sent by Takedown Piracy are checked to ensure compliance by the allegedly infringing website. Notices that have not been satisfied will be escalated to, including but not limited to, webhost and upstream provider. In the event of non-compliance, Takedown Piracy can and will confer with the clients legal representatives and/or specialists in copyright infringement law.

All Rights Reserved.

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Nate Glass
Authorized DMCA Agent
[Email:nate@takedownpiracy.com](mailto:nate@takedownpiracy.com)

From: **Nate Glass** <nate@takedownpiracy.com>
Date: 2015-02-16 21:09 GMT+01:00
Subject: DMCA Notice for Copyright Holder : Porn Pros
To: "Freemovies.tv" <DMCA@servitubes.com>

My name is Nate Glass, and I am a person authorized to act on behalf of the owner of an exclusive right that is being infringed.

Authorized DMCA Agent:
Nate Glass
8045 Retriever Ave.
Las Vegas, NV
89147
(818) 730-4666
nate@takedownpiracy.com

Copyright Holder:
Porn Pros
16673 Roscoe Blvd.
North Hills, CA
91343

The following works are the copyrighted property of Porn Pros:
<http://www.freemovies.tv/video/amazing-butt-behind-the-iron-bars/>
<http://www.freemovies.tv/video/anal-ecstasy-with-jewels-jade/>

A representative list of these works is available at <http://www.pornpros.com>

Under penalty of perjury:
I have a good-faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent or the law.

The information in the notification is accurate.

I am authorized to act
on behalf of the owner of an exclusive right that is allegedly infringed.

This notice is also to inform the allegedly infringing service provider that the copyright holder listed above has not licensed, to the allegedly infringing website, any works to be used in the manner

depicted above. Furthermore, copyright holder strongly encourages the operators of the allegedly infringing site to not allow the continued use of copyright holders works without the expressed written consent of the copyright holder. This includes, but is not limited to, filtering of content as well as prohibiting the use of copyright holders content in an infringing manner.

As per DMCA law section 512(i) to be eligible for Safe Harbor a service provider must meet certain requirements. One of these requirements is:

"(service provider)...has adopted and reasonably implemented, and informs subscribers of the service of, a policy for the termination of subscribers of the service who are repeat infringers"

For this reason, copyright holder strongly encourages the recipient of this notice to adopt and implement a repeat infringer policy.

In order to make the content removal process easier in the future, Takedown Piracy suggests that you add the copyright holder listed in this notice to a list of Prohibited or Banned Content on your site and filter and/or remove any content owned by this copyright owner.

Please note that all DMCA notices sent by Takedown Piracy are checked to ensure compliance by the allegedly infringing website. Notices that have not been satisfied will be escalated to, including but not limited to, webhost and upstream provider. In the event of non-compliance, Takedown Piracy can and will confer with the clients legal representatives and/or specialists in copyright infringement law.

All Rights Reserved.

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Nate Glass
Authorized DMCA Agent
[Email:nate@takedownpiracy.com](mailto:nate@takedownpiracy.com)

From: **Nate Glass** <nate@takedownpiracy.com>
Date: 2014-11-03 21:47 GMT+01:00
Subject: DMCA Notice for Copyright Holder : Porn Pros
To: DMCA@servitubes.com

My name is Nate Glass, and I am a person authorized to act on behalf of the owner of an exclusive right that is being infringed.

Authorized DMCA Agent:
Nate Glass
8045 Retriever Ave.
Las Vegas, NV
89147
(818) 730-4666
nate@takedownpiracy.com

Copyright Holder:
Porn Pros
16673 Roscoe Blvd.
North Hills, CA
91343

The following works are the copyrighted property of Porn Pros:
<http://www.freemovies.tv/video/alexis-adams-is-great-masseuse/>

A representative list of these works is available at <http://www.pornpros.com>

Under penalty of perjury:
I have a good-faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent or the law.

The information in the notification is accurate.

I am authorized to act
on behalf of the owner of an exclusive right that is allegedly infringed.

This notice is also to inform the allegedly infringing service provider that the copyright holder listed above has not licensed, to the allegedly infringing website, any works to be used in the manner depicted above. Furthermore, copyright holder strongly encourages

the operators of the allegedly infringing site to not allow the continued use of copyright holders works without the expressed written consent of the copyright holder. This includes, but is not limited to, filtering of content as well as prohibiting the use of copyright holders content in an infringing manner.

As per DMCA law section 512(i) to be eligible for Safe Harbor a service provider must meet certain requirements. One of these requirements is:

"(service provider)...has adopted and reasonably implemented, and informs subscribers of the service of, a policy for the termination of subscribers of the service who are repeat infringers"

For this reason, copyright holder strongly encourages the recipient of this notice to adopt and implement a repeat infringer policy.

In order to make the content removal process easier in the future, Takedown Piracy suggests that you add the copyright holder listed in this notice to a list of Prohibited or Banned Content on your site and filter and/or remove any content owned by this copyright owner.

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All Rights Reserved.

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Nate Glass
Authorized DMCA Agent
[Email:nate@takedownpiracy.com](mailto:nate@takedownpiracy.com)

From: **Nate Glass** <nate@takedownpiracy.com>
Date: 2014-10-09 0:44 GMT+02:00
Subject: DMCA Notice for Copyright Holder : Porn Pros
To: DMCA@servitubes.com

My name is Nate Glass, and I am a person authorized to act on behalf of the owner of an exclusive right that is being infringed.

Authorized DMCA Agent:
Nate Glass
8045 Retriever Ave.
Las Vegas, NV
89147
(818) 730-4666
nate@takedownpiracy.com

Copyright Holder:
Porn Pros
16673 Roscoe Blvd.
North Hills, CA
91343

The following works are the copyrighted property of Porn Pros:
<http://www.freemovies.tv/video/special-massage-for-a-busty-milf/>

A representative list of these works is available at <http://www.pornpros.com>

Under penalty of perjury:
I have a good-faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent or the law.

The information in the notification is accurate.

I am authorized to act
on behalf of the owner of an exclusive right that is allegedly infringed.

This notice is also to inform the allegedly infringing service provider that the copyright holder listed above has not licensed, to the allegedly infringing website, any works to be used in the manner depicted above. Furthermore, copyright holder strongly encourages

the operators of the allegedly infringing site to not allow the continued use of copyright holders works without the expressed written consent of the copyright holder. This includes, but is not limited to, filtering of content as well as prohibiting the use of copyright holders content in an infringing manner.

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"(service provider)...has adopted and reasonably implemented, and informs subscribers of the service of, a policy for the termination of subscribers of the service who are repeat infringers"

For this reason, copyright holder strongly encourages the recipient of this notice to adopt and implement a repeat infringer policy.

In order to make the content removal process easier in the future, Takedown Piracy suggests that you add the copyright holder listed in this notice to a list of Prohibited or Banned Content on your site and filter and/or remove any content owned by this copyright owner.

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All Rights Reserved.

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Nate Glass
Authorized DMCA Agent
[Email:nate@takedownpiracy.com](mailto:nate@takedownpiracy.com)

From: **Nate Glass** <nate@takedownpiracy.com>
Date: 2014-10-06 4:01 GMT+02:00
Subject: DMCA Notice for Copyright Holder : Porn Pros
To: DMCA@servitubes.com

My name is Nate Glass, and I am a person authorized to act on behalf of the owner of an exclusive right that is being infringed.

Authorized DMCA Agent:
Nate Glass
8045 Retriever Ave.
Las Vegas, NV
89147
(818) 730-4666
nate@takedownpiracy.com

Copyright Holder:
Porn Pros
16673 Roscoe Blvd.
North Hills, CA
91343

The following works are the copyrighted property of Porn Pros:
<http://www.freemovies.tv/video/jessica-robin-and-her-big-tits/>

A representative list of these works is available at <http://www.pornpros.com>

Under penalty of perjury:
I have a good-faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent or the law.

The information in the notification is accurate.

I am authorized to act
on behalf of the owner of an exclusive right that is allegedly infringed.

This notice is also to inform the allegedly infringing service provider that the copyright holder listed above has not licensed, to the allegedly infringing website, any works to be used in the manner depicted above. Furthermore, copyright holder strongly encourages

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All Rights Reserved.

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Nate Glass
Authorized DMCA Agent
[Email:nate@takedownpiracy.com](mailto:nate@takedownpiracy.com)

From: **Nate Glass** <nate@takedownpiracy.com>
Date: 2014-10-01 23:32 GMT+02:00
Subject: DMCA Notice for Copyright Holder : Porn Pros
To: DMCA@servitubes.com

My name is Nate Glass, and I am a person authorized to act on behalf of the owner of an exclusive right that is being infringed.

Authorized DMCA Agent:
Nate Glass
8045 Retriever Ave.
Las Vegas, NV
89147
(818) 730-4666
nate@takedownpiracy.com

Copyright Holder:
Porn Pros
16673 Roscoe Blvd.
North Hills, CA
91343

The following works are the copyrighted property of Porn Pros:
<http://www.freemovies.tv/video/cock-juice-for-mom/>
<http://www.freemovies.tv/video/diana-doll-humiliated/>
<http://www.freemovies.tv/video/enjoying-a-penis/>

A representative list of these works is available at <http://www.pornpros.com>

Under penalty of perjury:
I have a good-faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent or the law.

The information in the notification is accurate.

I am authorized to act
on behalf of the owner of an exclusive right that is allegedly infringed.

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In the event of non-compliance, Takedown Piracy can and will confer with the clients legal representatives and/or specialists in copyright infringement law.

All Rights Reserved.

--

Nate Glass

Authorized DMCA Agent

[Email:nate@takedownpiracy.com](mailto:nate@takedownpiracy.com)

From: **Nate Glass** <nate@takedownpiracy.com>
Date: 2014-09-30 12:40 GMT+02:00
Subject: DMCA Notice for Copyright Holder : Porn Pros
To: DMCA@servitubes.com

My name is Nate Glass, and I am a person authorized to act on behalf of the owner of an exclusive right that is being infringed.

Authorized DMCA Agent:
Nate Glass
8045 Retriever Ave.
Las Vegas, NV
89147
(818) 730-4666
nate@takedownpiracy.com

Copyright Holder:
Porn Pros
16673 Roscoe Blvd.
North Hills, CA
91343

The following works are the copyrighted property of Porn Pros:
<http://www.freemovies.tv/video/alyssa-funke-a-k-a-stella-ann-casting/>
<http://www.freemovies.tv/video/awesome-threesome-with-two-brunettes/>
<http://www.freemovies.tv/video/blowjob-feast/>

A representative list of these works is available at <http://www.pornpros.com>

Under penalty of perjury:
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The information in the notification is accurate.

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Nate Glass
Authorized DMCA Agent
[Email:nate@takedownpiracy.com](mailto:nate@takedownpiracy.com)